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*Attorneys for Proposed
Lead Plaintiff Joel Krieger*

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

JOEL KRIEGER, Individually and on Behalf
of All Others Similarly Situated,

Plaintiff,

vs.

ATHEROS COMMUNICATIONS, INC.,
DR. WILLY C. SHIH, DR. TERESA H.
MENG, DR. CRAIG H. BARRATT,
ANDREW S. RAPPAPORT, DAN A.
ARTUSI, CHARLES E. HARRIS,
MARSHALL L. MOHR, CHRISTINE
KING, QUALCOMM INCORPORATED,
and T MERGER SUB, INC.,

Defendants.

Case Number 11-CV-00640-LHK

**REPLY MEMORANDUM OF POINTS
AND AUTHORITIES IN FURTHER
SUPPORT OF MOTION FOR
APPOINTMENT OF JOEL KRIEGER
AS LEAD PLAINTIFF PURSUANT TO
§21D OF THE SECURITIES
EXCHANGE ACT OF 1934 AND FOR
APPROVAL OF LEAD PLAINTIFF'S
CHOICE OF LEAD COUNSEL**

CLASS ACTION

Judge: Hon. Lucy H. Koh
Courtroom: #8, 4th Floor
Hearing Date: December 15, 2011
Time: 1:30 P.M.

1 Joel Krieger (hereinafter “Plaintiff” or “Movant”) respectfully submits his reply
2 memorandum in further support of his motion for appointment as Lead Plaintiff pursuant to §21D of
3 the Securities Exchange Act of 1934 and for approval of his choice of counsel as Lead Counsel (the
4 “Motion”).

5 **ARGUMENT**

6 As noted in Plaintiff’s opening memorandum in support of his Motion, presently pending in
7 this District is a shareholder class action brought by Plaintiff on behalf of himself and similarly
8 situated shareholders of Atheros Communications, Inc. (“Atheros” or the “Company”) concerning
9 the acquisition of the Company by Qualcomm Incorporated and its wholly owned subsidiary T
10 Merger Sub Inc. (collectively “Qualcomm”). *See* First Amended Complaint, filed June 30, 2011,
11 Docket Entry ##50-51. Plaintiff alleges that Atheros and Qualcomm, along with Dr. Willy C. Shih,
12 Dr. Teresa H. Meng, Dr. Craig H. Barratt, Andrew S. Rappaport, Dan A. Artusi, Charles E. Harris,
13 Marshall L. Mohr and Christine King (the “Individual Defendants”) (collectively “Defendants”)
14 caused a materially false and misleading proxy to be issued in violation of §14(a) and Rule 14a-9
15 promulgated thereunder, and §20(a) of the Securities Exchange Act of 1934 (the “Exchange Act”).

16 Pursuant to the Private Securities Litigation Reform Act of 1995 (“PSLRA”) (codified at 15
17 U.S.C. §78u-4), Plaintiff filed his Motion and supporting papers on September 16, 2011. *See*
18 Docket Entry ##52-54. Any response or opposition to the Motion was due on September 30, 2011.
19 As of today’s date, no response or opposition to the Motion has been received by Plaintiff, or is
20 reflected on the docket. Under these circumstances, Plaintiff respectfully requests that the Motion
21 be granted and that the Court appoint Plaintiff as Lead Plaintiff and his choice of Faruqi & Faruqi,
22 LLP as Lead Counsel in this action.

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1 Dated: September 16, 2011

FARUQI & FARUQI, LLP

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3 By: /s/Vahn Alexander
VAHN ALEXANDER (167373)

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8 -and-

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17 *Counsel for Proposed Lead Plaintiff*
18 *and the Proposed Class*

1 **CERTIFICATE OF SERVICE**

2 I hereby certify that on October 7, 2011, I electronically filed the foregoing with the Clerk of
3 the Court using the CM/ECF system, which will send notification of such filing to the e-mail
4 addresses denoted on the Electronic Mail Notice List, and I hereby certify that I have mailed the
5 foregoing document *via* the United States Postal Service to the non-CM/ECF participants indicated
6 on the Manual Notice List.

7
8 /s/Vahn Alexander
Vahn Alexander

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Mailing Information for a Case 5:11-cv-00640-LHK

Electronic Mail Notice List

The following are those who are currently on the list to receive e-mail notices for this case.

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Manual Notice List

The following is the list of attorneys who are **not** on the list to receive e-mail notices for this case (who therefore require manual noticing). You may wish to use your mouse to select and copy this list into your word processing program in order to create notices or labels for these recipients.

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